

WILMER CUTLER PICKERING
HALE AND DORR LLP
SONAL N. MEHTA (SBN 222086)
Sonal.Mehta@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, California 94306
Telephone: (650) 858-6000
Facsimile: (650) 858-6100

DAVID Z. GRINGER (*pro hac vice*)
David.Gringer@wilmerhale.com
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888

ARI HOLTZBLATT (*pro hac vice*)
Ari.Holtzblatt@wilmerhale.com
MOLLY M. JENNINGS (*pro hac vice*)
Molly.Jennings@wilmerhale.com
1875 Pennsylvania Ave NW
Washington, DC 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363

Attorneys for Defendant Meta Platforms, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated.

Plaintiffs.

V.

META PLATFORMS, INC., a Delaware Corporation

Defendant

Case No. 5:20-cv-08570-JD

**[PROPOSED] ORDER REGARDING
COMBINED ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF BRIEFING FOR
MOTION TO DISMISS THE FIRST
AMENDED CONSOLIDATED
ADVERTISER CLASS ACTION
COMPLAINT**

Judge: Hon. James Donato

1 THIS MATTER, having come before the Court on Defendant's Combined Administrative
 2 Motion to File Under Seal Portions of Briefing for Motion to Dismiss the First Amended
 3 Consolidated Advertiser Class Action Complaint, and the Court having considered the Declaration
 4 of Jitin Khurana In Support of Defendant's Administrative Motion to Seal, and other appropriate
 5 papers:

6 The Court finds compelling reasons to support the filing under seal of the portions of
 7 documents described herein. Accordingly,

8 IT IS ORDERED that the following portions of documents shall be filed under seal and
 9 sealed from the public record:

Document	Information sought to be sealed	Reason for Sealing
Defendant's Motion to Dismiss the First Amended Consolidated Advertiser Class Action Complaint (Dkt. 262)	Highlighted portion of lines 8 and 9 at page 11.	Contains non-public information regarding specific terms of contracts with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. <i>See</i> Khurana Decl. ¶¶ 6, 7.
Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss (Dkt. 271)	Highlighted portion of lines 10 to 12 at page 5.	Contains non-public information regarding specific terms of contracts with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. <i>See</i> Khurana Decl. ¶¶ 6, 7.
Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss (Dkt. 271)	Highlighted portion of lines 16 to 18 at page 6.	Contains non-public information regarding specific terms of contracts with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. <i>See</i> Khurana Decl. ¶¶ 6, 7.
Advertiser Plaintiffs' Opposition to Meta's Motion to Dismiss (Dkt. 271)	Highlighted portion of lines 21 to 24 at page 12.	Contains non-public information regarding specific terms of contracts

1		with business counterparties which, if revealed to competitors or counterparties, could cause competitive harm to Meta. <i>See</i> Khurana Decl. ¶¶ 6, 7.
---	--	--

5 **IT IS SO ORDERED.**

6 Dated: April _____, 2022

7 _____
8 The Honorable James Donato
9 United States District Court Judge

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28